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Of Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORLAND DIVISION

LARRY BALCOM, an individual, by and through his attorney-in-fact, and **MARY BARNES**, attorney-in-fact for Larry Balcom,

Plaintiffs,

v.

CLINTON PETERSON and **APRIL PETERSON**, a married couple, and **FORECLOSURE HELP, L.L.C.**, an Idaho Limited Liability Company, **TRUSTED HOME OFFER, L.L.C.**, an Idaho Limited Liability Company, and **JOHN & JANE DOES 1-5**,

Defendants.

Case No: 3:23-cv-00528-SB

DECLARATION OF TERRY SCANNELL IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL AND FOR SANCTIONS

I, Terry Scannell, being first duly sworn, depose and say:

1. I am the founder and senior attorney of Scannellaw, LLC, counsel of record for the Plaintiffs. I am over the age of 18 and have knowledge of the facts stated herein and I am competent to testify concerning the same. The following information is provided in support of Plaintiffs Larry Balcom and Mary Barnes' Motion to Compel and for Sanctions.

2. On May 23, 2024, I paid for an Intelius Report on Clinton Wayne Peterson in order to find public information about his known addresses and business ventures.

3. This report indicated that from April 8, 2020, to August 17, 2023, a home at 6029 E Wildhorse Lane, Boise ID 83712 was owned by Clinton Peterson.

4. From August 18, 2023, to present the owner of 6029 E Wildhorse Lane, Boise ID 83712 is listed as Lending Associates International, LLC, a Delaware Limited Liability Company whose manager is listed as Clinton Wayne Peterson.

5. The May 23, 2023, Intelius Report also showed that the ownership of 3113 Parkview Way, Nampa, ID 83687 has transferred several times.

6. Beginning on June 23, 2021, 3113 Parkview Way, Nampa, ID 83687 was owned by Black Hawk, LLC.

7. It was then transferred to April and Clinton Peterson on January 3, 2022, before being transferred back to Black Hawk, LLC on December 27, 2022.

**I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE
BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE
FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR
PERJURY.**

Dated: June 10, 2024

/s/ Terry Scannell
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing on the persons listed below and that it was sent via the US Postal Service pre-paid to them at their address of record, and their name and address as listed below and by e-mail.

April & Clinton Peterson
1775 W State Street
Boise, ID 83702
april@208prestige.com
clintonwpeterson@gmail.com
Defendants

April & Clinton Peterson
1775 W State Street, #275
Boise, ID 83702
april@208prestige.com
clintonwpeterson@gmail.com
Defendants

Clinton Peterson, Registered Agent
c/o Foreclosure Help, LLC
1775 W State Street, #275
Boise, ID 83702
clintonwpeterson@gmail.com

Clinton Peterson, Registered Agent
c/o Trusted Home Offer, LLC
1775 W State Street, #275
Boise, ID 83702
clintonwpeterson@gmail.com

DATED: June 10, 2024

/s/Terry Scannell

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